

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CALVIN PUCKETT JR.,

Plaintiff,

v.

THE CBE GROUP, INC.,

Defendant.

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CASE NO. _____

DEFENDANT THE CBE GROUP, INC.’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant The CBE Group, Inc. (“CBE”) hereby removes the subject action from the Magistrate Court of Gwinnett County, Georgia, to the United States District Court for the Northern District of Georgia, on the following grounds:

1. Plaintiff Calvin Puckett Jr. (“Plaintiff”) instituted an action in the Magistrate Court of Gwinnett County, Georgia, on May 13, 2024. A copy of the Complaint is attached hereto as **Exhibit A**.

2. CBE was served on May 22, 2024. Therefore, removal is timely.

3. Plaintiff’s Complaint alleges violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the “FCRA”).

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. §1331, since there is a federal question. This suit falls within the FCRA

which thus supplies the federal question.

5. Pursuant to 28 U.S.C. §1441, *et seq.*, this cause may be removed from the Magistrate Court of Gwinnett County, Georgia, to the United States District Court for the Northern District of Georgia.

6. Notice of this removal will promptly be filed with the clerk of the Magistrate Court of Gwinnett County, Georgia and be served on all adverse parties.

7. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant are attached hereto and marked as composite **Exhibit A** and incorporated herein by reference

8. A jury demand was not made in state court.

WHEREFORE, Defendant The CBE Group, Inc., by counsel, removes the subject action from the Magistrate Court of Gwinnett County, Georgia to the United States District Court for the Northern District of Georgia.

Respectfully submitted this 21st day of June 2024.

BEDARD LAW GROUP, P.C.

/s/ Jonathan K. Aust

Jonathan K. Aust
Georgia Bar No. 448584
John H. Bedard, Jr.
Georgia Bar No. 043473
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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed Defendant's Notice of Removal using the CM/ECF system and I hereby certify that I served a copy of the foregoing by depositing a copy of same in the United States Mail in a properly addressed envelope with adequate postage thereon to:

Calvin Puckett, Jr.
P.O. Box 675622
Marietta, Georgia 30006

Respectfully submitted this 21st day of June 2024.

BEDARD LAW GROUP, P.C.

/s/ Jonathan K. Aust

Jonathan K. Aust

Georgia Bar No. 448584

John H. Bedard, Jr.

Georgia Bar No. 043473

Counsel for Defendant